



**Arizona Department of Education  
Health and Nutrition Services Division**

**Provision 2 Base Year - Administrative Review Summary Report**

School Food Authority Name: Arlington Elementary District

CTD: 07-04-47

Site: Arlington Elementary School

Contacts: Chad Turner, Superintendent; Gabriela Medina, Cafeteria Manager

Review Date: October 31, 2019

Review Period: September 2019

Programs Reviewed:       National School Lunch       School Breakfast       Afterschool Snack  
                                           Fresh Fruit & Vegetable       Special Milk       At-Risk Afterschool Meals

No.	Review Observations & Findings	Technical Assistance Provided	Required Corrective Action
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**Performance Standard 1: Certification & Benefit Issuance- Critical Area**

<p>1 Eleven applications were certified incorrectly or utilized incomplete information. This contributed toward fiscal action calculations.</p>	<p>Discussed errors found and required corrective action. Referred to Processing Applications, Reviewing Applications Based on Income, Assessing Completeness of Categorically Eligible Applications, Determining Eligibility for Categorically Eligible Applications sections in USDA's Eligibility Manual for School Meals. Suggested completing the training: Step by Step Instruction: How to Process Household Applications found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a> under the 3000-Administration tab.</p>	<p><i>Corrections have been made to certification errors. Please describe the process that will be implemented to reduce the amount of errors that occur while determining the eligibility status for each student. Additionally, the certificate of completion of Step by Step Instruction: How to Process Household Applications must be submitted.</i></p>
<p>2 In multiple instances, the eligibility determined was not transferred correctly to the benefit issuance document. This contributed toward fiscal action calculations. Two reduced students on BID as free.</p>	<p>Discussed best practices (such as having someone double check) for ensuring eligibility status is transferred to the benefit issuance document on a regular basis. The Step by Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a>.</p>	<p><i>Corrections have been made to the benefit issuance document. Please provide a written description of the process that will be implemented to ensure that the benefit issuance document matches all current students and the support documentation of their eligibility status.</i></p>

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| 3 | Students in the sample selected did not have supporting eligibility documentation on file. Two students were on BID as migrant but not included on liaison list.                         | Discussed best practices of organization for eligibility documentation, including that for 30 day rollover from previous year eligibility. Discussed that all free and reduced price applications, as well as homeless and migrant liaison reports and direct certification reports, including applications from households determined ineligible for benefits, must be kept on file for a minimum of five years after the final claim is submitted for the fiscal year to which they pertain as is required by Arizona law.                                                                                                                                                                                                                                                                                  | <i>Corrections have been made to the certification status of these students. Please provide written procedures that will be implemented to ensure that all free and reduced price applications will be kept on file according to USDA's requirements and written assurance that this will occur.</i>                                                                   |
| 4 | Students who were identified as Potential Direct Certification Matches via "Partial Match" were not confirmed for free eligibility. This contributed towards fiscal action calculations. | Discussed if the LEA can confirm that the partially-matched student is the individual shown in CNP Direct Certification, the user will certify him/her as a Match. Additionally, discussed if the LEA confirms that the partially-matched student is not the individual described in CNP Direct Certification, the user will not certify the student and will declare him/her as a No Match. Regardless if the student is identified as a Match or No Match, the user is required to review and accurately make a decision regarding the students match status using the Partial Match confirmation. Step by Step Instruction: How to Directly Certify a Partial Match can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/verification/">http://www.azed.gov/hns/nslp/verification/</a> . | <i>Corrections have been made to certification status of these students. Please provide written procedures for how partially matched students will be processed and written assurance that students who are identified as Potential Direct Certification Matches via "Partial Match" will be confirmed as a match prior to certifying them for free meal benefits.</i> |
| 5 | Multiple denied applications were denied incorrectly. One was a DC Match and two were income reduced.                                                                                    | Discussed errors found and required corrective action. The Step by Step Instruction: How to Process Household Applications can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingp">http://www.azed.gov/hns/nslp/trainingp</a> <a href="http://www.azed.gov/hns/nslp/trainingp">s/online/</a> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <i>Corrections have been made to the certification status. Please provide written procedures that will be implemented to ensure that applications will be double checked for accurate eligibility determinations utilizing current eligibility guidelines.</i>                                                                                                         |

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**Performance Standard 1: Meal Counting & Claiming- Critical Area**

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No findings.

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**Meal Access & Reimbursement: Certification & Benefit Issuance**

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| 6 | The benefit issuance document is not being updated in a timely manner to reflect changes in eligibility, new students or withdrawn students.                                                                                                                                                                                                             | Discussed potential changes that can be made to system to ensure that updates are made in a timely manner. The Step by Step Instruction: How to Create a Benefit Issuance Document (BID) can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainingps/online/">http://www.azed.gov/hns/nslp/trainingps/online/</a> . | <i>Please provide a benefit issuance document that demonstrates timely updates, such as changes in eligibility, new students or withdrawn students. Additionally, please provide written assurance that moving forward, all updates will occur in a timely manner.</i> |
| 7 | The parent letter for Provision 2 Base Year was not used, and the letter used does not contain required content pertaining to non-pricing during base year.                                                                                                                                                                                              | Reviewed required content of parent letter and referred to USDA's Eligibility Manual for School Meals. Suggested using ADE's template Provision Letter for Provision 2 Parent Outreach Letter which can be found at <a href="http://www.azed.gov/hns/nslp/forms">http://www.azed.gov/hns/nslp/forms</a> .                                 | <i>Please provide the parent letter stating that meals are provided at no cost during the Provision 2 Base Year. Additionally, please provide written assurance that the parent letter will contain all required information henceforth.</i>                           |
| 8 | The benefit issuance document does not contain all required entries. Specifically, multiple student entries did not include the date the current eligibility determination was made.                                                                                                                                                                     | Referred to Step by Step Instruction: How to Create a Benefit Issuance Document (BID) on ADE's website found at <a href="http://www.azed.gov/hns/nslp/trainingps/">http://www.azed.gov/hns/nslp/trainingps/</a> .                                                                                                                         | <i>Please provide a complete current benefit issuance document that contains entries in all required sections.</i>                                                                                                                                                     |
| 9 | An individual separate from the application approval process has not consistently been designated as the hearing official within communication to households. The initial 'Notification Letter for School Meals' provided to reviewer states that in order to request a hearing to contact the same individual that makes the eligibility determination. | Referred to Hearing Procedure section in USDA's Eligibility Manual for School Meals. Discussed school official who could be designated.                                                                                                                                                                                                   | <i>Please provide the name and title of the individual designated as the hearing official. Additionally, please provide documentation to demonstrate where households are notified of the hearing official.</i>                                                        |

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**Meal Access & Reimbursement: Verification**

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| 10 | The most recent verification report was not submitted on time. The 2018-2019 program year report was not submitted until February 27th.                                                                                                                                                                                                                                                                                                                                                                                                                            | Discussed due date for verification report (February 1st) and that report can be submitted as early as November. Discussed who will be responsible for submitting report.                                                                                                                                                                                                                                                                                                                                                                   | <i>Please provide written procedures that will be implemented to ensure that the verification report will be submitted prior to the required due date.</i>                             |
| 11 | Households selected for verification were not notified adequately. Specifically, the notification letter provided as communication to specific households did not state that documentation of income or receipt of assistance may be provided from any point in time between the month prior to application and the deadline the documentation was due. In addition, the notification letter states that the household must provide the social security number of each adult household member that is 21 years if age or older. This mandate is not in compliance. | Discussed requirements for notifying households selected for verification and potential timelines. Referred to Notification of Verification Letter found on ADE's website at <a href="http://www.azed.gov/hns/nslp/verification/">http://www.azed.gov/hns/nslp/verification/</a> . Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at <a href="http://www.azed.gov/hns/nslp/programguidance/">http://www.azed.gov/hns/nslp/programguidance/</a> . | <i>Please provide a copy of the notification letter. Additionally, provide written assurance that households selected for verification will be notified according to requirements.</i> |

<p>12 The notice of adverse action was not adequate. Specifically, it did not clarify that although there was a change in benefit qualification for the student, all meals are provided at no cost during the Provision 2 Base Year.</p>	<p>Discussed requirements for notifying households of adverse action during a non-pricing base year. Referred to Letter of Verification Results and Online Training: Verification Review found on ADE's Verification webpage: <a href="http://www.azed.gov/hns/nslp/verification/">http://www.azed.gov/hns/nslp/verification/</a>. Additionally, referred to Section 6: Verification in USDA's Eligibility Manual for School Meals, Revised July 2017 found on ADE's website at <a href="http://www.azed.gov/hns/nslp/programguidance/">http://www.azed.gov/hns/nslp/programguidance/</a>.</p>	<p><i>Please provide written assurance that an adequate notice of adverse action will be provided to households that will have a decrease in benefits. Additionally, provide a copy of the form that will be used for this purpose.</i></p>
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**Meal Access & Reimbursement: Meal Counting & Claiming**

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<p>13 Daily edit checks are not being conducted appropriately. Specifically, the attendance factor on the daily edit check does not match the attendance factor on the monthly reimbursement claims.</p>	<p>Discussed how to complete daily edit checks using ADE's Daily Edit Check worksheet. The Daily Edit Check Worksheet can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/forms/">http://www.azed.gov/hns/nslp/forms/</a>. The Step by Step Instruction: How to Complete Daily Edit Checks can be found on ADE's website at <a href="http://www.azed.gov/hns/nslp/trainings/online/">http://www.azed.gov/hns/nslp/trainings/online/</a>.</p>	<p><i>Please provide a completed daily edit check worksheet for the month of [month requested]. Additionally, please provide written assurance that daily edit checks will be conducted. Additionally, the certificate of completion of Step by Step Instruction: How to Complete Daily Edit Checks must be submitted.</i></p>
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**General Program Compliance: Civil Rights**

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No findings.

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Comments/Recommendations:

Congratulations! Arlington Elementary District has completed the Provision 2 Base Year Administrative Review for the 2019-2020 school year. Thank you for your effort and diligence during the review process. It is evident that you are working to ensure that the program is operated well.

**To stay on track with NSLP requirements, check out the NSLP at a Glance Calendar & Monthly Checklist on our website at <http://www.azed.gov/hns/nslp/>.**

**Training: In-person classes, Web-based training, and How-To guides can be found on ADE's website at <http://www.azed.gov/hns/nslp/trainings/>.**

Fiscal Action Assessed?

<input type="checkbox"/> No- SBP	<input checked="" type="checkbox"/> Yes- SBP	\$308.70
<input type="checkbox"/> No- NSLP	<input checked="" type="checkbox"/> Yes- NSLP	\$590.80

Please submit corrective action response by December 20, 2019 to Karil Hurst at [karil.hurst@azed.gov](mailto:karil.hurst@azed.gov), or ADE School Nutrition, Attn: Karil Hurst, 1535 W. Jefferson St., Bin #7, Phoenix, AZ 85007.

  
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Reviewer Signature                      11/27/19  
Date

  
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Program Director Signature                      12/2/19  
Date

If you disagree with any finding that affects the claim for reimbursement, you may appeal the decision by following the National School Lunch Program Administrative Review Appeal Procedures found here:  
<https://cms.azed.gov/home/GetDocumentFile?id=58dbe2581130c01500d4b08b>

Kathy Hoffman, Superintendent of Public Instruction  
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